

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

In re:) Chapter 11
)
LEE STEEL CORPORATION. *et al.*¹) Case No. 15-45784-mbm
)
)
Debtors.) Judge Marci B. McIvor
)

**NOTICE OF DEBTORS' MOTION FOR ENTRY OF AN ORDER PURSUANT TO 11
U.S.C. §§ 363 AND 365, BANKRUPTCY RULES 2002 AND 6004, AND LOCAL RULES
6004-1 AND 9014-1 (A) ESTABLISHING BIDDING PROCEDURES FOR THE
AUCTION SALE OF SUBSTANTIALLY ALL OF DEBTORS' ASSETS FREE AND
CLEAR OF LIENS, CLAIMS AND ENCUMBRANCES AND TRANSFERRING LIENS
TO PROCEEDS; (B) SCHEDULING AN AUCTION AND A SALE HEARING TO
CONSIDER APPROVAL OF SALE; (C) ESTABLISHING PROCEDURES FOR THE
ASSUMPTION AND ASSIGNMENT OF EXECUTORY CONTRACTS;
(D) APPROVING THE FORM OF ASSET PURCHASE AGREEMENT, FORM AND
MANNER OF THE AUCTION NOTICE, THE FORM OF THE NOTICE TO
NON-DEBTOR CO-PARTIES TO EXECUTORY CONTRACTS,
AND THE NOTICE OF THE SALE HEARING**

The above captioned debtors and debtors-in-possession (the “Debtors”) have filed papers with the Court (the “Motion”) for entry of an Order (A) Establishing Bidding Procedures for the Auction Sale of Substantially all of Debtors’ Assets Free and Clear of Liens, Claims and Encumbrances and Transferring Liens to Proceeds; (B) Scheduling an Auction and a Sale Hearing to Consider Approval of Sale; (C) Establishing Procedures for the Assumption and Assignment of Executory Contracts; (D) Approving the Form of Asset Purchase Agreement, Form and Manner of the Auction Notice, the Form of the Notice to Non-Debtor Co-Parties to Executory Contracts, and the Notice of the Sale Hearing.

¹ Debtors include Lee Steel Corporation, Case No. 15-45784-mbm; Taylor Industrial Properties, L.L.C., Case No. 15-45785-mbm, and 4L Ventures, LLC, Case No. 15-45788-mbm.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in these bankruptcy cases. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant the Application, or if you want the court to consider your views on the Application, **within 21 days**, you or your attorney must:

1. File with the court a written response or an answer, explaining your position at:²

U.S. Bankruptcy Court
Attn. Clerk of the Court
211 W. Fort Street
Detroit, MI 48226

If you mail your response to the court for filing, you must mail it early enough so the court will receive it on or before the date stated above.

You must also mail a copy to:

Stephen M. Gross, Esq.
McDonald Hopkins PLC
39533 Woodward Avenue, Ste. 318
Bloomfield Hills, MI 48304

2. If a response or answer is timely filed and served, the clerk will schedule a hearing on the motion and you will be served with a notice of the date, time and location of the hearing.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the Application or objection and may enter an order granting the relief.

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² Any response or answer must comply with Rules 8(b), (c) and (e) of the Federal Rules of Civil Procedure.

Respectfully Submitted,

/s/ Stephen M. Gross
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COUNSEL FOR THE DEBTORS
AND DEBTORS IN POSSESSION

Dated: May 1, 2015